

**Martin White**  
*Senior Vice President*  
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October 20, 2004

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

In the matter of: Amendment of Part 22 of the Commission's Rules to Benefit the Consumers of Air-Ground Telecommunications Services, WT Docket No. 03-103 United Airlines offers the following comments regarding the Federal Communications Commission's reexamination of the rules governing the provision of air-ground telecommunications services on commercial aircraft:

United Airlines has utilized air-ground voice services in the 800 Mhz band for over a decade. United Airlines recognizes the need for broadband services on aircraft. Our customers want the same connectivity on our aircraft as they have on the ground.

Our customers' expectations of data transfer rates continue to grow to the point where they expect an in-flight product to offer data transfer rates comparable to their experiences with broadband services at home or in the office. United Airlines recommends that the Commission:

1. Retain the 4 Mhz spectrum in the 800 Mhz band for commercial and operational air to ground services.
2. Not split up the 4 MHz spectrum and allocate slices of the spectrum to multiple service providers to the point where none of the service providers would have the bandwidth necessary to meet the current and future broadband expectations of the consumer.
3. Not dictate what type of services the spectrum is used for, i.e., voice services versus data services versus email, etc. Customer demand for various services will change over time, and service providers must have the flexibility to change their service offerings to meet the consumer demand. It is expected, however, that these services will be centered on the digital data transport.

In addition, United believes that the Commission should promote competition in broadband air-ground services, yet not risk interference at any altitude. To be effective, this product must be viable for customer use above 10,000 feet and airline use from takeoff to landing. In this way, the Commission can ensure that a competitive marketplace will govern the price of air-ground services, foster the development of new communications capabilities, and encourage the rapid implementation of these important new services.

Regards,

A handwritten signature in black ink, appearing to read "Martin White", written over a horizontal line.

Martin White